

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANA MARIA BUSTLE and)	
EVANGELINA MARTINEZ,)	
)	
Plaintiffs,)	Case No. 17 CV 1599
)	
v.)	Judge Elaine Bucklo
)	
THE TWO LIONS PUB & GRILL INC.,)	Magistrate Judge Sidney I. Schenkier
and MIGUEL A. PEREZ, individually,)	
)	
Defendants.)	

JOINT MOTION FOR COURT APPROVAL OF SETTLEMENT

Plaintiffs Ana Maria Bustle and Evangelina Martinez (“Plaintiffs”) and Defendants The Two Lions Pub & Grill, Inc., and Miguel Perez, individually, (“Defendants”), by and through their respective attorneys, jointly move the Court to approve the settlement agreed to by the Parties and submitted to chambers for review. In support of the motion, the Parties state as follows:

1. On March 1, 2017, Plaintiffs filed their complaint against Defendants under the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* (“FLSA”), the Illinois Minimum Wage Law, 820 ILCS 105/1 *et seq.* (“IMWL”), the Illinois Wage Payment Collection Act, 820 ILCS 115/1 *et seq.* (“IWPCA”), and the Chicago Minimum Wage Ordinance, Chicago, Ill., Code § 1-24-010 *et seq.* (“Chicago MW”), arising out of their former employment with Defendants.

2. Following a settlement conference with Magistrate Judge Sidney I. Schenkier, the Parties have reached a mutually satisfactory settlement, which both sides agree adequately compensates Plaintiffs for any and all claims for alleged back wages, including any applicable overtime and minimum wage payments, arising from their employment with Defendants.

3. When employees bring a private action against their employer or former employer

for alleged back wages under the FLSA, and the parties present to the district court a proposed settlement, the district court may enter a stipulated judgment dismissing the case after scrutinizing the settlement to ensure that it is a fair and reasonable resolution of a bona fide dispute over wages under the FLSA. *See Walton v. United Consumers Club, Inc.*, 786 F.2d 303, 306 (7th Cir. 1986); *Lynn's Food Stores v. United States*, 679 F.2d 1350, 1355 (11th Cir. 1982).

4. Submitted herewith to chambers, for *in camera* review by the Court, is the Settlement Agreement entered into between Plaintiffs and Defendants, as well as a proposed Order Approving Settlement. The Parties respectfully request that this Settlement Agreement not become part of the record in this case.

5. The Parties jointly request that the Court approve the Settlement Agreement because it is a fair and reasonable solution of bona fide disputes over wages under the FLSA.

6. The Parties further request that the Court dismiss this case without prejudice pursuant to the terms of the Settlement Agreement. The Parties have submitted a proposed order to that effect to the Court's proposed order email address.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that this Court enter an Order approving the Settlement Agreement as a fair and reasonable resolution of bona fide disputes under the FLSA.

Respectfully Submitted,

Dated: March 30, 2018

Plaintiffs Ana Maria Bustle and
Evangelina Martinez

s/Javier Castro

Javier Castro

Lydia Colunga-Merchant

Raise the Floor Alliance – Legal Dept.

1 N. LaSalle, Suite 1275

Chicago, IL 60602

(312) 795-9115

Defendants The Two Lions Pub & Grill, Inc.
and Miguel Perez, individually

s/Walker R. Lawrence

Walker R. Lawrence

Maduff & Maduff, LLC

205 N. Michigan Ave., Suite 2050

Chicago, IL 60601

(312) 276-9000

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on this 30th day of March, 2018, the foregoing **Joint Motion for Court Approval of Settlement** was filed electronically with the Clerk of the court using the CM/ECG system, which sent notification of such filing to the following:

Walker R. Lawrence
Maduff & Maduff, LLC
205 N. Michigan Ave., Suite 2050
Chicago, IL 60601
wrlawrence@madufflaw.com

s/Javier Castro
Javier Castro
Raise the Floor Alliance – Legal Dept.
1 N. LaSalle Street, Suite 1275
Chicago, Illinois 60602
(312) 795-9115